REMARKS

This is intended as a full and complete response to the Final Office Action dated May 31, 2006, having a shortened statutory period for response set to expire on August 31, 2006. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-26 are pending in the application. Claims 7, 9-15, 20, 22 and 24-26 remain pending following entry of this response. Claims 7 and 20 have been amended. Claims 1-6, 8, 16-19 and 23 have been canceled. Applicants submit that the amendments do not introduce new matter.

Claim Rejections - 35 U.S.C. § 102

Claims 16-19 are rejected under 25 U.S.C. 102(e) as being anticipated by Bays et. al. (US Pat. No. 6,519,603). Claims 16-19 have been cancelled, thereby obviating this rejection.

Claims 7-8, 12-21, and 23-26 are rejected under 35 U.S.C. 102(e) as being anticipated by Bargeron et al. (US Pub. No. 2004/0205545, hereinafter referred as *Bargeron*). Applicants respectfully traverse these rejections.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Further, the elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Bargeron* does not disclose "each and every element as set forth in the claim". For example, *Bargeron* does not disclose "configuration tools allowing a

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user to define an annotation structure containing one or more annotation fields and associate the annotation structure with at least one of the annotatable data objects, wherein the configuration tools further allow a user to define roles and associate annotation structures with combinations of roles and annotatable data objects" as recited in claim 7, which has been amended to include the limitation of now canceled claim 8. Claim 20 recites similar limitations, previously included in now canceled claim 23.

In addressing previous claim 8, the Examiner argues "wherein the configuration tools further allow a user to define roles and associate annotation structures with combinations of roles and annotatable data objects" is taught in paragraph [0056] of *Bargeron*. Paragraph [0056] of *Bargeron* states:

> [0056] A set element allows annotations to be grouped together, such as for organization purposes, access control purposes, etc. FIG. 7 is a block diagram illustrating an exemplary schema structure for a set element. A set element 250 includes an ID field 252, a name field 254, an optional parents fields 256, a children field 258, a create date field 260, and an optional property field 262. ID field 252 contains data that uniquely identifies the set (either globally (such as a GUID) or locally (such as uniquely identifying the set within the annotation that the set element is part of)), and name field 254 contains data identifying a more user-friendly name for the set. Create date field 260 contains data that indicates when the annotation set was created. Annotations can be organized hierarchically, with each annotation being a member of zero or more sets and each set including one or more annotations. Additionally, sets can have other sets as members.

The cited section simply discusses how annotations (not annotation structures) in *Bargeron* may be grouped for organization purposes or for access control purposes. However, nowhere in the cited section or anywhere else in *Bargeron* are configuration tools discussed, much less configuration tools which "allow a user to define roles and associate annotation structures with combinations of roles and annotatable data objects."

As described in the specification of the present application, a configuration tool which allows "a user to define roles and associate annotation structures with combinations of roles and annotatable data objects" may be, for example, a GUI allowing a user to specify user roles and access to annotation structures based on the user roles. Examples of configuration tools which allow a user to define roles and associate annotation structures with combinations of roles and annotatable data objects can be seen in Figures 5A and 5F of the specification. Figure 5A illustrates a GUI panel 530 which allows a user to add new roles. Furthermore, Figure 5F illustrates a GUI panel 560 which "may allow a user to specify an authority…that one or more users or roles 564 has with respect to a list of corresponding fields or annotation field groups 562."

By allowing a user to associate an annotation structure with a combination of a user roles and data objects, the annotation structures presented to a user of an annotation system may vary based on the role of the user and the data object the user may be trying to annotate. For example, by associating an annotation structure with combinations of a particular role (e.g., manager or non-manager) and with a particular data object (e.g. a spreadsheet), a manager may see a first annotation structure when annotating a particular data object, while a non-manager may not see the same annotation structure.

In contrast, *Bargeron* only recites "a set element allows annotations to be grouped together, such as for organization purposes, access control purposes." (*Bargeron*, Paragraph 56, Lines 1-3). Nowhere in the paragraph of Bargeron cited by the Examiner or anywhere else in *Bargeron* are configuration tools taught which "allow a user to define roles and associate annotation structures with combinations of roles and annotatable data objects." Therefore, claims 7, 20 and their dependents are believed to be allowable, and allowance of the claims is respectfully requested.

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Claim Rejections - 35 U.S.C. § 103

Claims 9-11 and 22 are rejected under 35 U.S.C. 103(a) as being obvious over Bargeron as applied to claim 7 above, and further in view of Tada et al. (US Patent 6,490,583, hereinafter referred as Tada).

Claims 9-11 depend on claim 7 which is believed to be allowable, therefore, claims 9-11 are believed to be allowable and allowance of the claims is respectfully requested. Claim 22 depends on claim 20 which is believed to be allowable, therefore, claim 22 is believed to be allowable and allowance of the claim is respectfully requested.

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Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Randol Read, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted,

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